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U.S. DISTRICT COURT E.D.N.Y.

★ DEC 13 2022 ★

LONG ISLAND OFFICE

MRM:CPK
F. #2021R00405

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
-----X

UNITED STATES OF AMERICA

- against -

ROYA JAFARI-HASSAD,

Defendant.

-----X
THE GRAND JURY CHARGES:

INDICTMENT

Cr. No. **CR 22 545**

(T. 21, U.S.C., §§ 841(a)(1),
841(b)(1)(C), 853(a) and 853(p); T. 18,
U.S.C., §§ 1512(b)(1), 1512(b)(2)(A),
1512(c)(2), 2 and 3551 et seq.)

BROWN, J.
TISCIONE, M.J.

COUNTS ONE THROUGH FIFTEEN
(Distribution of Oxycodone)

1. On or about the dates set forth below, within the Eastern District of New York and elsewhere, the defendant ROYA JAFARI-HASSAD, together with others, did knowingly and intentionally distribute a substance containing oxycodone, a Schedule II controlled substance, to patients whose identities are known to the Grand Jury, as set forth below, without authorization pursuant to Title 21, United States Code, Chapter 13, Subchapter I, to wit: the authorization set forth in Title 21, Code of Federal Regulations, Section 1306.04(a) for an individual practitioner in the usual course of her professional practice to issue a prescription for a controlled substance for a legitimate medical purpose and to dispense a Schedule II controlled substance.

COUNT	PATIENT	DATE	NUMBER OF PILLS	OXYCODONE PER PILL
ONE	M.S.	April 20, 2021	30	10 milligrams

COUNT	PATIENT	DATE	NUMBER OF PILLS	OXYCODONE PER PILL
TWO	M.S.	May 4, 2021	30	10 milligrams
THREE	M.S.	May 18, 2021	30	10 milligrams
FOUR	M.S.	June 15, 2021	30	20 milligrams
FIVE	M.S.	July 27, 2021	45	20 milligrams
SIX	M.S.	September 13, 2021	120	20 milligrams
SEVEN	M.S.	October 21, 2021	120	20 milligrams
EIGHT	M.S.	November 18, 2021	120	20 milligrams
NINE	M.S.	January 13, 2022	120	20 milligrams
TEN	V.P.	August 17, 2020	60	30 milligrams
ELEVEN	V.P.	September 3, 2020	60	30 milligrams
TWELVE	V.P.	September 30, 2020	60	30 milligrams
THIRTEEN	V.P.	October 12, 2020	60	30 milligrams
FOURTEEN	V.P.	October 28, 2020	60	30 milligrams
FIFTEEN	V.P.	November 23, 2020	60	30 milligrams

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18,

United States Code, Sections 2 and 3551 et seq.)

COUNT SIXTEEN

(Tampering with a Witness – John Doe 1)

2. On or about and between May 5, 2022 and September 30, 2022, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ROYA JAFARI-HASSAD, together with others, did knowingly and intentionally: (1) use intimidation, threaten and corruptly persuade, and attempt to do so, and engage in misleading

conduct toward another person, to wit: John Doe 1, an individual whose identity is known to the Grand Jury, with intent to (a) influence, delay and prevent the testimony of John Doe 1 in an official proceeding, to wit: a proceeding before a Federal Grand Jury in the Eastern District of New York, and (b) cause and induce John Doe 1 to withhold testimony from said official proceeding; and (2) corruptly obstruct, influence and impede said official proceeding, and attempt to do so.

(Title 18, United States Code, Sections 1512(b)(1), 1512(b)(2)(A), 1512(c)(2), 2 and 3551 et seq.)

COUNT SEVENTEEN

(Tampering with a Witness – John Doe 2)

3. On or about and between May 5, 2022 and September 30, 2022, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ROYA JAFARI-HASSAD, together with others, did knowingly and intentionally: (1) use intimidation, threaten and corruptly persuade, and attempt to do so, and engage in misleading conduct toward another person, to wit: John Doe 2, an individual whose identity is known to the Grand Jury, with intent to (a) influence, delay and prevent the testimony of John Doe 2 in an official proceeding, to wit: a proceeding before a Federal Grand Jury in the Eastern District of New York, and (b) cause and induce John Doe 2 to withhold testimony from said official proceeding; and (2) corruptly obstruct, influence and impede said official proceeding, and attempt to do so.

(Title 18, United States Code, Sections 1512(b)(1), 1512(b)(2)(A), 1512(c)(2), 2 and 3551 et seq.)

**CRIMINAL FORFEITURE ALLEGATION
AS TO COUNTS ONE THROUGH FIFTEEN**

4. The United States hereby gives notice to the defendant that, upon her conviction of any of the offenses charged in Counts One through Fifteen, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person convicted of such offenses to forfeit: (a) any property constituting, or derived from, any proceeds obtained directly or indirectly as the result of such offenses, and (b) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses.

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(a) and 853(p))

A TRUE BILL



FOREPERSON

By Carolyn Pokorny, Assistant U.S. Attorney

BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F.#: 2021R00405
FORM DBD-34
JUN. 85

No. _____

UNITED STATES DISTRICT COURT

EASTERN District of NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

ROYA JAFARI-HASSAD,

Defendant.

INDICTMENT

(T. 21, U.S.C., §§ 841(a)(1), 841(b)(1)(C), 853(a) and 853(p); T. 18,
U.S.C., §§ 1512(b)(1), 1512(b)(2)(A), 1512(c)(2), 2 and 3551 et seq.)

A true bill. *[Signature]* *[Signature]*

Foreperson

Filed in open court this _____ *day,*

of _____ *A.D. 20* _____

Clerk

Bail, \$ _____

Charles P. Kelly, Assistant U.S. Attorney (631) 715-7866